

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

FAIZAL BHIMANI and
OM SRI SAI, INC.,
Defendants.

No. 3:17-CR- 324

INDICTMENT

THE GRAND JURY CHARGES:

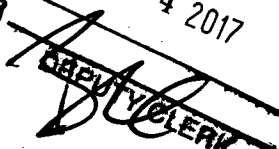
COUNT ONE

Sex Trafficking by Force and Coercion
18 U.S.C. §§ 2; 1591(a)(1), (a)(2), and (b)(1)

From in or about June 2014, to the date of this Indictment, in the
Middle District of Pennsylvania and elsewhere, the defendants,

FAIZAL BHIMANI and
OM SRI SAI, INC.,

did knowingly recruit, entice, harbor, transport, provide, patronize,
solicit, maintain, and obtain multiple victims by any means in and
affecting interstate commerce, and did benefit financially and receive
anything of value from participation in a venture which recruited,
enticed, harbored, transported, provided, obtained, and maintained by
any means in and affecting interstate or foreign commerce, multiple

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victims, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause multiple victims to engage in commercial sex acts, and aided and abetted same.

All in violation of Title 18, United States Code, Sections 2 and 1591(a)(1), (a)(2), and (b)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

**Sex Trafficking by Force and Coercion Conspiracy
18 U.S.C. § 1594(c)**

From in or about June 2014, to the date of this Indictment, in the
Middle District of Pennsylvania, the defendant,

**FAIZAL BHIMANI, and
OM SRI SAI, INC.,**

conspired with one or more other persons, known and unknown to the
Grand Jury, to knowingly recruit, entice, harbor, transport, provide,
patronize, solicit, obtain, and maintained by any means in and affecting
interstate or foreign commerce, and to benefit financially and receive
anything of value from participation in a venture which recruited,
enticed, harbored, transported, provided, obtained, and maintained by
any means in and affecting interstate or foreign commerce, multiple
victims, knowing and in reckless disregard of the fact that force, threats
of force, fraud, and coercion would be used to cause multiple victims to
engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1594(c) and
1591(a) and (b)(1).

THE GRAND JURY FURTHER CHARGES:

COUNT THREE
Drug Trafficking Conspiracy
21 U.S.C. § 846

From in or about June 2014, and continuing to the date of this Indictment, in the Middle District of Pennsylvania, the defendants,

FAIZAL BHIMANI and
OM SRI SAI, INC.,

knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury, to commit the following offense(s) against the United States: to distribute and possess with intent to distribute cocaine, a Schedule II narcotic controlled substance; cocaine base, a Schedule II narcotic controlled substance; heroin, a Schedule I narcotic controlled substance; and marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR
Managing a Drug Premises
21 U.S.C. § 856(a)(2)

From in or about June 2014, to the date of this Indictment, in the
Middle District of Pennsylvania, the defendants,

FAIZAL BHIMANI and
OM SRI SAI, INC.,

did unlawfully and knowingly manage and control a hotel located in
Bartonsville, Monroe County, Pennsylvania, as an owner, agent,
employee, and occupant, and did knowingly and intentionally rent,
lease, profit from, and make available for use said place for the purpose
of unlawfully manufacturing, storing, distributing, and using a
controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.

2. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Sections 371 and 1591 and Title 21, United States Code, Section 846, the defendants, Faizal Bhimani and Om Sri Sai, Inc., shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. All property, tangible and intangible, owned by OM SRI SAI, Inc., including but not limited to any bank accounts, accounts receivable, franchise agreements, and any other

asset;

- b. Real property located at 1779 North 9th Street, Bartonsville, PA 18321 consisting of the following parcel numbers 17/17/1/62-2 (a/k/a PIN 17638100428846), 17/17/1/62-1 (a/k/a PIN 17638100429707), 17/17/1/11-1 (a/k/a PIN 17638100438111), 17/17/1/61-2 (a/k/a PIN 17638100521795), 17/17/1/61-1 (a/k/a PIN 17638100523561), and 17/17/1/62 (a/k/a PIN 17638100531001), owner of record OM SRI SAI Inc.; and
- c. Pennsylvania Liquor Control Board Liquor License Registration No. 46359, licensee OM SRI SAI Inc.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

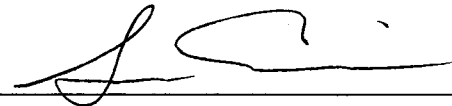
A TRUE BILL

BRUCE D. BRANDLER
United States Attorney


FOREPERSON

Date: 10-24-17

By:


SEAN A. CAMONI

Assistant United States Attorney